

AFFIDAVIT

I, Jason R. Roth, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since February 23, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. Your Affiant completed United States Postal Inspection Service Basic Training in May 2013. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, your Affiant has worked since May 2013 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of a search warrant for the following property, namely a package associated with the following United States Postal Service (USPS) Priority Mail, Tracking Number:

a. 9505 5158 9992 8127 2306 37

as further described in Attachment A. This affidavit is made in support of a warrant to search the package for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offenses:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841,
- b. Use of a Communication Facility, in violation of Title 21, United States Code, § 843(b), and
- c. Conspiracy to Possess with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 846.

Because this affidavit is submitted in support of the application of the United States to search the parcel, it does not include every fact known concerning this investigation; I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the above-described parcel.

4. Your Affiant has become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled

substance prosecutions where Priority Mail Express and/or Priority Mail were used, your Affiant has learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion - false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. On or about May 8, 2018, your Affiant received information from the Los Angeles Division of the United States Postal Inspection Service about a Priority Mail parcel going to Cincinnati, OH possibly containing illegal narcotics due to an ongoing investigation. On or about May 10, 2018, the parcel arrived at the Lockland Post Office in Cincinnati, OH 45215. Your affiant instructed a supervisor at the Lockland Post Office to secure the parcel in the manager's office until your Affiant could take control of the parcel. On or about May 15, 2018 your Affiant took control of the parcel from the Lockland Post Office.

The parcel is further described as:

Priority Mail, Tracking Number: 9505 5158 9992 8127 2306 37

Sender: Mike Hudson
6450 Carlsbad Blvd
Carlsbad, CA 92011

Addressee: Jeffrey McKanna
4 Terrace Dr.
Cincinnati, OH 45215

6. Observation and USPS tracking information of the above listed Priority Mail parcel, by your Affiant, indicated it was mailed from the William Taft Post Office, San Diego, CA 92117. However the return address indicates Carlsbad, CA 92011. All seams on the parcel are taped.
7. The Consolidated Lead Evaluation and Reporting (CLEAR) database system was researched by your Affiant regarding the listed return address, Mike Hudson, 6450 Carlsbad Blvd, Carlsbad, CA 92011. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated there is no Mike Hudson associated with that address.
8. The CLEAR database was researched by your Affiant regarding the listed addressee on

the package, Jeffrey McKanna, 4 Terrace Dr., Cincinnati, OH 45215. The information obtained from the system indicated the last time Jeffrey McKanna was associated with that address was in 2013.

9. On or about May 15, 2018, your Affiant arranged for Officer Mike Harper, Cincinnati Police Department, for a narcotics canine to check the parcel. Officer Harper and his canine "Cairo" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Office of the Attorney General (Ohio). Officer Harper reports that "Cairo" passed all of his examinations and has successfully located hidden drugs in the past and therefore your Affiant considers "Cairo" to be reliable. On the same date, your Affiant met Officer Harper at the USPS Cincinnati Field Office where the parcel listed above was placed in a separate office among several other similar parcels and presented to narcotic canine, "Cairo", who alerted positively to the presence or odor of a controlled substance upon the USPS package described below:

a. Priority Mail, Tracking Number: 9505 5158 9992 8127 2306 37

Attached herewith, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.

10. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Cairo" is indicative of the parcel containing narcotics or proceeds relating thereof.

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11. Based upon the information contained in this affidavit, your Affiant believes that there is probable cause to believe that the parcel described below will contain evidence and/or contraband, fruits of crime, or other items illegally possessed:

a. **Priority Mail, Tracking Number: 9505 5158 9992 8127 2306 37**

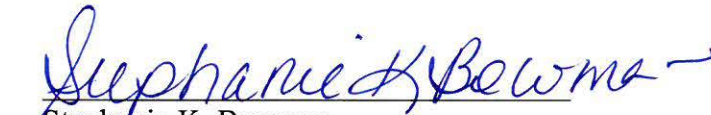
Therefore, a search warrant to open the parcel is requested.

Further, your Affiant sayeth naught.



Jason R. Roth
U.S. Postal Inspector

Subscribed and sworn to and before me this 15 day of May, 2018



Stephanie K. Bowman
United States Magistrate Judge

ATTACHMENT A
PROPERTY TO BE SEARCHED

The property to be searched is the package associated with **Priority Mail, Tracking Number: 9505 5158 9992 8127 2306 37**, addressed to Jeffrey McKanna, 4 Terrace Dr., Cincinnati, OH 45215, with a return address of Mike Hudson, 6450 Carlsbad Blvd, Carlsbad, CA 92011.



United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT


I, OFFICER M. HARPER, AM, AND HAVE BEEN, EMPLOYED BY THE CINCINNATI POLICE DEPARTMENT, SINCE 2001. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "CAIRO", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

Marijuana, Hashish, Cocaine, Heroin, Methamphetamines, Ecstasy

ON 05/15/2018, AT THE REQUEST OF POSTAL INSPECTOR J.R. ROTH I RESPONDED TO THE US POSTAL INSPECTION SERVICE CINCINNATI FIELD OFFICE WHERE "CAIRO" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

USPS Priority Mail, Tracking Number: 9505 5158 9992 8127 2306 37, addressed to Jeffrey McKanna, 4 Terrace Dr., Cincinnati, OH 45215 with a return address of Mike Hudson, 6450 Carlsbad Blvd, Carlsbad, CA 92011.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "CAIRO", I CONSIDER THE ABOVE DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.

 5/15/18
(Signature and Date)